1 HEATHER E. WILLIAMS, #122664 Federal Defender 2 DOUGLAS J. BEEVERS, # 288639 Assistant Federal Defender 801 I Street, 3rd Floor 3 Sacramento, CA 95814 Telephone: (916) 498-5700 4 5 Attorney for Defendant JULIO SARABIA 6 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE EASTERN DISTRICT OF CALIFORNIA 9 UNITED STATES OF AMERICA, Case No. 2:24-cr-00164-DC-1 10 Plaintiff, STIPULATION AND (PROPOSED) ORDER TO CONTINUE SENTENCING HEARING 11 v. 12 Judge: Hon. Dena M. Coggins JULIO SARABIA. 13 Defendants. 14 15 IT IS HEREBY STIPULATED by and between Michele Beckwith, Acting United States 16 Attorney, through Jason Hitt, Assistant United States Attorney, attorney for Plaintiff, Heather 17 Williams, Federal Defender, through Assistant Federal Defender Douglas J. Beevers, attorneys 18 for JULIO SARABIA, that the sentencing hearing scheduled for June 13, 2025, at 9:30 a.m., be 19 vacated and the matter continued to September 19, 2025, at 9:30 a.m. 20 The defense requests the additional time in order to investigate facts related to informal 21 objections which have been filed and other mitigation evidence. Additional time is needed for 22 counsel to travel to Taft, California to meet the client to prepare for sentencing and the 23 possibility of testifying regarding the objections. This is the first requested continuance of the 24

Sentencing Hearing in this matter.

Counsel and the defendant also agree that the ends of justice served by the Court granting this continuance outweigh the best interests of the public and the defendant in a speedy sentencing.

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1	DATED: May 22, 2025	
2		Respectfully submitted,
3		HEATHER E. WILLIAMS Federal Defender
4		
5		<u>/s/ Douglas J. Beevers</u> DOUGLAS J. BEEVERS
6		Assistant Federal Defender Attorney for JULIO CESAR SARABIA
7	DATED: Mov. 22, 2025	MICHELE BECKWITH
8	DATED: May 22, 2025	Acting United States Attorney
9		/s/ Jason Hitt JASON HITT
10		Assistant United States Attorney Attorney for Plaintiff
11		Automey for Flamum
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	Stimulation and Proposed Order	-2-

## ORDER

The court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, ADOPTS the parties' stipulation in its entirety as its order. Accordingly, the Sentencing Hearing as to Defendant Julio Cesar Sarabia set for June 13, 2025, is VACATED and RESET for September 19, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. The court finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The court finds the ends of justice served by granting the requested continuance and outweigh the best interests of the public and defendants in a speedy sentencing.

IT IS SO ORDERED.

Dated: **May 23, 2025** 

Dena Coggins

United States District Judge